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Cooperating attorneys on behalf of the  
ACLU Foundation of Oregon, Inc.

Attorneys for Plaintiffs Rummell, West, Chickadonz, Tanner, and Basic Rights Education Fund

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION**

PAUL RUMMELL and BENJAMIN WEST;  
LISA CHICKADONZ and CHRISTINE TANNER;  
BASIC RIGHTS EDUCATION FUND,

*Plaintiffs,*

v.

JOHN KITZHABER, in his official  
capacity as Governor of Oregon; ELLEN  
ROSENBLUM, in her official capacity as Attorney  
General of Oregon; JENNIFER WOODWARD, in  
her official capacity as State Registrar, Center for  
Health Statistics, Oregon Health Authority, and  
RANDY WALRUFF, in his official capacity as  
Multnomah County Assessor,

*Defendants.*

No. 6:13-cv-02256-MC

**NOTICE OF SETTLEMENT OF  
ATTORNEYS' FEES AND COSTS**

**AND**

**UNOPPOSED MOTION TO  
SUSPEND DEADLINE TO FILE  
PETITION FOR ATTORNEYS'  
FEES AND COSTS**

By Plaintiffs Paul Rummell,  
Benjamin West, Lisa Chickadonz,  
Christine Tanner, and  
Basic Rights Education Fund

DEANNA L. GEIGER and JANINE M.  
NELSON; ROBERT DUEHMIG and  
WILLIAM GRIESAR,

No. 6:13-cv-01834-MC

*Plaintiffs,*

v.

JOHN KITZHABER, in his official  
capacity as Governor of Oregon; ELLEN  
ROSENBLUM, in her official capacity as Attorney  
General of Oregon; JENNIFER WOODWARD, in  
her official capacity as State Registrar, Center for  
Health Statistics, Oregon Health Authority, and  
RANDY WALRUFF, in his official capacity as  
Multnomah County Assessor,

*Defendants.*

### **CONFERRAL CERTIFICATION**

Misha Isaak, counsel for plaintiffs Paul Rummell, Benjamin West, Lisa Chickadonz, Christine Tanner, and Basic Rights Education Fund, conferred in good faith about this motion with Lea Ann Easton, counsel for plaintiffs Deanna Geiger, Janine Nelson, Robert Duehmig and William Griesar; Sheila Potter, counsel for defendants John Kitzhaber, Ellen Rosenblum, and Jennifer Woodward; and Katharine von Ter Stegge, counsel for defendant Randy Walruff. The motion is unopposed.

### **NOTICE AND MOTION**

Plaintiffs Paul Rummell, Benjamin West, Lisa Chickadonz, Christine Tanner, and Basic Rights Education Fund (collectively, the “Rummell plaintiffs”) hereby give notice that they have reached a settlement in principle with defendants John Kitzhaber, Ellen Rosenblum, and Jennifer Woodward (collectively, the “State defendants”) with respect to recovery of attorneys’ fees and costs pursuant to 42 U.S.C. § 1988(b). The Rummell plaintiffs and the State defendants have not yet had an opportunity to memorialize their settlement in a written instrument; accordingly,

The Rummell plaintiffs hereby move this Court to suspend the deadline to file a petition for attorneys' fees and costs while they work with the State to finalize the settlement. The Rummell plaintiffs will promptly notify the Court when the settlement is finalized and paid.

As the Court knows, all counsel have worked diligently, effectively, and cooperatively in this matter, and this motion is unopposed. This motion, if granted, will have no impact on other existing deadlines.

DATED: July 15, 2014

*s/ Misha Isaak*

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